

**THE WEITZ LAW FIRM, P.A.**

Bank of America Building  
18305 Biscayne Blvd., Suite 214  
Aventura, Florida 33160

**MEMO ENDORSED**

April 22, 2020

**VIA CM/ECF**

Honorable Judge Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Sq., Courtroom 443  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: **4/22/2020**

**Re: Slone v. JKJ CORP., d/b/a Associated Supermarket, et al.-  
Case 1:19-cv-08617-VEC**

Dear Judge Caproni:

All parties jointly hereby respectfully request the Court to stay all deadlines in the above-captioned matter for an additional period of thirty (30) days, which had been previously stayed by this Court on April 27, 2020 [D.E. 25].

Due to the continuing national health crisis caused by the COVID-19 pandemic, the diminished economic effects it is causing public businesses such as this business, as well as limited office resources including Plaintiff's counsel working remotely from home due to his underlying health conditions and the pandemic, all parties' counsel hereby jointly respectfully request that the Court grant an additional thirty (30) day stay of all deadlines in this matter, including the current April 27, 2020 deadline to amend the Complaint [D.E. 25] or to respond in opposition of the pending Motion to Dismiss [D.E. 23] and Defendant JKJ Corp.'s current May 4, 2020 reply deadline. In addition, in order for the Plaintiff to adequately amend the Complaint, which he intends to do, a follow-up site inspection is necessary to identify any recent architectural modifications to the subject facility which is currently a risky proposition due to the ongoing pandemic (and which would also likely entail Plaintiff's counsel flying up from Florida to New York to attend the inspection), and which has been agreed upon by Plaintiff and JKJ Corp.'s counsel, but has been indefinitely delayed due to this COVID-19 pandemic.

The Court may wish to note that this is the second joint request to stay the deadlines in this matter. Thank you for your consideration of this necessary joint request.

Respectfully submitted,

By: S/ B. Bradley Weitz  
B. Bradley Weitz, Esq.  
The Weitz Law Firm, P.A.  
18305 Biscayne Blvd., Suite 214  
Aventura, FL 33160  
Telephone: (305) 949-7777  
Facsimile: (305) 704-3877  
Email: bbw@weitzfirm.com  
*Attorney for Plaintiff*

By: S/ Migir Ilganayev  
Migir Ilganayev, Esq.  
Ilganayev Law Firm  
139 Fulton Street, Suite 801  
New York, NY 10038  
Telephone: (917) 957-3563  
Email: ilganayevlaw@gmail.com  
*Attorney for JKJ Corp.*

By: S/ Steven B. Sperber  
Steven B. Sperber, Esq.  
Sperber Denneberg & Kahan, P.C.  
48 West 37th Street, 16th Floor  
New York, NY 10018  
Telephone: (917) 351-1335  
Facsimile: (917) 351-1303  
Email: ssperber@sdkpc.com  
*Attorney for 13-15 West 100 Street Corp.*

Application GRANTED. Plaintiff's deadline to file an amended complaint or opposition is extended to **June 30, 2020**. If Plaintiff files an opposition, Defendants' reply is due by **July 10, 2020**.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

4/22/2020